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September 13, 2007

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The Honorable Robert P. Patterson, Jr. United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED:

Re:

(2) Insurance Company of North America v. C.U. Transport Inc., China United Transport, Inc., Kawasaki Kisen Kaisha Ltd., K-Line; M/V "EASLINE TIANJIN", etc., MEMO ENDORSE 07 Civ. 959 (RPP)

(3) Reed & Barton Corporation v. M.V. Easline Tianjin, in rem and Yang Ming Marine Transport Corp. and Unifreight Forwarder Inc. 07 Civ. 1357 (RPP)

- (4) American Home Assurance Co. et al. v. Easline Tianjin, et al. 07 Civ. 2562 (RPP)
- (5) The Travelers v. M/V EASLINE TIANJIN 07 Civ. 3104 (RPP)
- (6) Klaussner International LLC v. MV. EASLINE TIANJIN, etc., et ano. 07 Civ. 3180 (RPP) Our File No.: 29356-JEO

Dear Judge Patterson:

We represent the plaintiffs in the actions referred to above as (3) and (6). We are writing on behalf of the other plaintiffs in actions (2), (4) and (5), and with the consent of

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counsel for Yang Ming Transport Corporation and Yang Ming (America) Corporation ("Yang Ming") in all of the above actions, to request a further two week extension until September 28, 2007 for all plaintiffs to file opposition papers to Yang Ming's Motions to Dismiss.

As we advised in our August 23, 200 7 letter, settlement negotiations were progressing. We are pleased to report that most of the plaintiffs have agreed to their attorney's recommendations with respect to the negotiations, however, two plaintiffs have not yet responded to the recommendation to settle.

We believe an additional two weeks will allow all the parties to resolve the outstanding settlement issues.

Respectfully submitted,

HILL RIVKINS & HAYDEN LLP

John Eric Olson

ÆO:ds

cc: $\underline{Fax Transmission} - 212-376-6488$

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